

DRAFT

Minimum Requirement Analysis

Background: The following Minimum Requirement Analysis (MRA) is being prepared consistent with the spirit and intent of the Wilderness Act of 1964 (16 U.S.C. 1131-1136). We authorize an activity only if we demonstrate that it is necessary to meet the minimum requirement for administering the area as wilderness and necessary to accomplish the purposes of the refuge, including Wilderness Act purposes. The MRA clarifies the need for and impacts of a proposed action.

Refuge Management Activity: Research and Monitoring

Refuges: Flattery Rocks, Quillayute Needles, and Copalis National Wildlife Refuges (Refuges), along the Pacific Coast of Washington State. They are part of the Washington Maritime National Wildlife Refuge Complex.

Wilderness Designation: In 1967 (USFWS) a Wilderness Study Report was prepared and in 1970 all units, except for Destruction Island, of the three refuges named above became the Washington Islands Wilderness Area (Public Law 91-504).

Refuge Purposes:

The 1907 establishing purpose for all three refuges is “a preserve and breeding ground for native birds and animals” (Executive Orders 703, 704, and 705).

Purposes of the Wilderness Act of 1964, as amended (16 U.S.C. 1131-1136) became additional purposes of the refuges with passage of Public Law 91-504 and establishment of the Washington Islands Wilderness. The purposes of the Wilderness Act are:

- To secure an enduring resource of wilderness;
- To protect and preserve the wilderness character of areas within the National Wilderness Preservation System (NWPS); and
- To administer the NWPS for the use and enjoyment of the American people in a way that will leave these areas unimpaired for future use and enjoyment as wilderness.

National Wildlife Refuge System Mission:

The mission of the National Wildlife Refuge System is “to administer a national network of lands and waters for the conservation, management, and where appropriate, restoration of the fish, wildlife, and plant resources and their habitats within the United States for the benefit of present and future generations of Americans” (National Wildlife Refuge System Administration Act of 1966, as amended [16 U.S.C. 668dd-668ee]).

MRA Step 1: Determine if it is necessary to take action

These three Refuges contain the majority of the seabird nesting colonies and marine mammal haulout sites in Washington State. Research and monitoring conducted by Service employees and their agents, including NOAA Fisheries and Washington Department of Fish and Wildlife (WDFW), contributes to regional and national conservation efforts for these species. While much of the research and monitoring activity does occur physically outside of wilderness as described below, the subjects of that monitoring are within wilderness. Opportunities to research or monitor these species elsewhere are almost non-existent because the majority of the nesting colonies and haulout sites are within wilderness. If research and monitoring are not conducted, then unobserved impacts to refuge wildlife could go unchecked for long periods of time leading to population declines that may have been preventable if they were detected sooner. Preventing population declines will both benefit wilderness wildlife values, and opportunities for people to observe island wildlife from boats and the mainland.

Step 1 Decision: *Is it necessary to take action?*

Yes **X** No Not Applicable

Explain: Research and monitoring of the most vulnerable refuge wildlife is necessary in order to continue to fulfill the purposes of these refuges as “a preserve and breeding ground for native birds and animals”; maintain the wilderness wildlife values on the Refuges; and help to fulfill the mission of the National Wildlife Refuge System.

MRA Step 2: Determine the minimum tool.

Description of Option #1

Research

Currently refuge staff are not actively conducting research, however it is anticipated that in the next 15 years there would be additional seabird research related to the recently completed Pacific Region Seabird Conservation Plan (USFWS 2005). Other species of concern and controlling invasive species could also be the focus of future research projects. The Service currently authorizes NOAA Fisheries, via a special use permit, to enter the Refuges including the wilderness area and collect scat a few times a year for marine mammal research. Below is a set of criteria which will be used for species conservation and refuge management-related research.

Research Criteria:

- Research that focuses on conservation of species of concern (seabirds, marine mammals) or control of invasive plants and animals.
- Research would be carried out by Service employees or their agents.
- “Generally prohibited tools” would not be used in wilderness.
- Disturbance to wildlife would not increase significantly.

The refuge manager occasionally receives requests from universities and others to conduct additional research on the Refuges. Each of these situations is considered on a case-by-case basis regarding value of the research, and impacts to wildlife and wilderness. This type of research is covered under a compatibility determination (see Appendix E-2) and prospective non-Service researchers will be required to prepare a separate MRA for proposed activities within wilderness. The wilderness act does not allow outside researchers and others who are not direct agents of the Service to use “generally prohibited tools” in wilderness portions of the Refuges.

Monitoring

Monitoring is conducted by refuge staff in order to determine seabird and marine mammal population status and trends; document wildlife disturbances; and control invasive species. Most monitoring occurs off-refuge and outside of the wilderness area. This is done to minimize disturbance to wildlife and to the wilderness area. Seabird and marine mammal surveys from aircraft at approximately 500 feet in elevation are conducted up to 5 times a year. Other monitoring is conducted using a spotting scope or binoculars with the observer on the mainland or in a motorized boat in the water surrounding the refuge units up to 30 days a year. On rare instances refuge staff will anchor a boat in the intertidal zone outside the wilderness area and walk onto the Refuge/wilderness area to obtain seabird colony information and/or look for invasive species. At no time is motorized equipment used in the wilderness.

Effects

Research and monitoring is mostly conducted with the researchers or observers situated outside of the wilderness area. During the few times when the wilderness area is entered, it is not altered and no permanent markers/structures are left. Therefore there are no direct physical impacts to the natural conditions in wilderness.

There is some wildlife disturbance associated with overflight surveys, motor boats passing near the islands, and occasional foot entry into the wilderness. The distance to wildlife, timing, and frequency of efforts are all carefully considered to minimize impacts to wildlife while maximizing the information obtained. The Washington Department of Fish and Wildlife (WDFW), Native American Tribes, and NOAA Fisheries also conduct marine mammal aerial surveys over the wilderness area. Since their coordinated aerial surveys combined with ours represent only a few days out of the year, the impacts to wilderness values are negligible.

These Refuges are not open to the public however they are important to the recreational experience of shoreline viewers and to the few people who observe them from boats. Since the duration and frequency of research and monitoring efforts is limited, there are many rocks and islands (up to 600) in the Washington Islands wilderness, and all of the Refuges and associated wilderness areas are closed to public use, the impacts to solitude are negligible.

Description of Option #2

Research and Monitoring

While no “generally prohibited uses” occur within designated wilderness under Option #1, Option #2 would involve the elimination of aerial surveys over wilderness and motorized boat surveys adjacent to wilderness. Only the islands closest to shore could be researched and monitored using spotting scopes and binoculars from the mainland or possibly from a non-motorized boat. Research and monitoring opportunities from the mainland are limited and non-motorized boats can only safely access the closest islands.

Effects

Wildlife Disturbance from Service activities would be less than in Option #1 however the research and monitoring information that could be gathered would be almost worthless. The most important seabird colonies and marine mammal areas are on islands farther from the mainland where disturbance from humans and predators is less. Consequently the most important wildlife units of the refuges would not be monitored if staff did not use aircraft and motorized boats leading to the same possible negative consequences of not monitoring at all. Potential wildlife population declines would negatively impact the wildlife and other values of the wilderness area.

Step 2 Decision: *What is the Minimum Tool?*

The selected option is #1

Explain: Occasionally accessing the wilderness area on foot; using binoculars and spotting scopes from shore and from the water in a motorized boats outside of the wilderness; and infrequent aerial surveys above the wilderness; are all needed to conduct research and monitoring of the most important wildlife sites on the Refuges. The small amount of wildlife disturbance caused by research and monitoring is minimal compared to the importance of collecting data that contributes to species conservation. These are therefore considered the minimum tools needed to accomplish refuge purposes including wilderness values. They preserve wilderness character and only minimally impact human solitude while benefitting the wildlife values of the wilderness.

No Wilderness Act section 4(c) “generally prohibited uses” are authorized. If the need for them should arise, an additional MRA will be prepared.

NEPA Compliance and Public Review : This MRA is being prepared in association with the Flattery Rocks, Quillayute Needles, and Copalis National Wildlife Refuges Draft Comprehensive Conservation Plan and Environmental Assessment (CCP/EA). It will be available for public review and comment at the same time as the Draft CCP/EA.

References

USFWS (United States Fish and Wildlife Service). 1967. Washington Islands Wilderness Study Areas- Wilderness Study Report. U. S. Department of the Interior, Fish and Wildlife Service, Bureau of Sport Fisheries and Wildlife.

USFWS. 2005. Regional Seabird Conservation Plan, Pacific Region. U.S. Fish and Wildlife Service, Migratory Birds and Habitat Programs, Pacific Region, Portland, Oregon.

Signatures

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